

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

**In re:** )  
W. R. GRACE & CO., et al. )      Chapter 11  
                                )      Case No. 01-01139 (JKF)  
Debtors.                   )      Jointly Administered  
                                )      Hearing Date: March 18, 2002  
                                )      Related to Docket Number 1665

**STATEMENT OF THE OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS TO THE DEBTORS' REVISED MOTION AS TO ALL  
NON-ASBESTOS CLAIMS AND CERTAIN OTHER CLAIMS FOR ENTRY OF CASE  
MANAGEMENT ORDER, ESTABLISHMENT OF A BAR DATE, APPROVAL  
OF THE PROOF OF CLAIM AND NOTICE PROGRAM**

The Official Committee of Unsecured Creditors (the "Creditors' Committee"), by its counsel, hereby submits this statement in response to the Court's directive during the February 25, 2002 hearing and its scheduling order dated February 27, 2002 and sets forth the Creditors' Committee's position on the Debtors' proposed amended forms of the following bar date-related documentation: (i) Bar Date Notice For All Claims, (ii) Claims Subject To Bar Date (Exhibit 1 to Bar Date Notice), (iii) Grace Non-Asbestos Proof of Claim Form, (iv) Specific Instructions for Completing Grace Non-Asbestos Proof of Claim Forms, and (v) General Instructions for Completing All Proof of Claim Forms (collectively, the "Bar Date Documentation"); and respectfully represents as follow:

**Further Amended Bar Date Documentation To Be Filed Should Reflect The  
Creditors' Committee's and Debtors' Discussions Over Appropriate Modifications**

1. On or about February 27, 2002, the Debtors filed their Revised Motion As To All Non-Asbestos Claims, Asbestos Property Damage and ZAI Claims for Entry of Case Management Order, Establishment of A Bar Date, Approval of Claim Forms and of The Notice

Program (the "Revised Motion"), to which Revised Motion the then current forms of the Bar Date Documentation were attached.

2. The Creditors' Committee has been engaged in an on-going dialogue with the Debtors over the content of the various bar date-related forms since the Debtors filed their motion in June 2001 seeking to establish a bar date for these Chapter 11 cases and to have a bar date notice and order and several proof of claim forms approved by the Court. In the course of those discussions, the Creditors' Committee identified numerous specific modifications to the Debtors' proposed bar date notice and related documentation and process, which it believes were and are necessary and appropriate.

3. The Bar Date Documentation filed with the Debtors' Revised Motion reflected most, albeit not yet all, of the Creditors' Committee's comments to such documentation. During the period since the filing of the Revised Motion, the Creditors' Committee and the Debtors have continued to work on and agree to further appropriate revisions to the Bar Date Documentation, and the Creditors' Committee understands that such modifications will be incorporated and reflected in a further filing of such documentation with the Court prior to the March 18, 2002 hearing. As a result, the Creditors' Committee has not filed an objection to the Bar Date Documentation providing line by line detail of the remaining modifications discussed with the Debtors.

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4. The Creditors' Committee reserves its rights to supplement and/or modify this statement as appropriate and necessary.

**WHEREFORE**, the Creditors' Committee respectfully requests that this Court approve Bar Date Documentation, as further amended, reflecting modifications requested by the Creditors' Committee, and grant such other and further relief as is just and proper.

Dated: Wilmington, Delaware  
March 8, 2002

Respectfully submitted:

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